

SFUND RECORDS CTR
0639-03888

BURRIS, LAGERLOF, SWIFT & SENECA

JOSEPH J. BURRIS
 STANLEY C. LAGERLOF
 MELVIN SWIFT, Jr.
 JESS SENECA
 JACK T. SWAFFORD
 JOHN F. BRADLEY
 WILLIAM G. DAVIS
 ERIC A. SCHUCK,
 JOHN G. CAMPOVOLI
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LAWYERS
 SUITE 2500 EQUITABLE PLAZA
 3435 WILshire BOULEVARD
 LOS ANGELES, CALIFORNIA 90010
 TELEPHONE (213) 385-4345

GEORGE W. DRYER
 1880-1980
 RAYMOND R. MAULS
 1880-1959

88042560

RECEIVED AR0269
OCT 7 1975

October 6, 1975

MONTROSE-TORRANCE

Mr. Max Sobelman
 Montrose Chemical Corporation
 Post Office Box 147
 Torrance, California 90502

Re: Citation of July 3, 1975

Dear Max:

Enclosed herewith for review by you and John Kallok is the inspector's report which is attached to the criminal complaint.

Very truly yours,

Jack T. Swafford
 of
 BURRIS, LAGERLOF, SWIFT & SENECA

JTS/bf

Enclosure

REQUEST FOR COMPLAINT

0639-3888

John G. Brown
Attorney City Attorney
1000 City Hall East
Los Angeles, Ca. 90012

MARK ALLEN

DATE OF VIOLATION July 3, 1975
APCO NUMBER 57562
NOTICE NUMBER G-9126

MONTROSE CHEMICAL CORPORATION OF ADDRESS(es) 20201 So. Normandie Avenue

CALIFORNIA, a corporation doing business in Calif.

Torrance, California 90501

PLACE OF VIOLATION 20201 So. Normandie Avenue, Torrance, Calif., 90501

WHERE VIOLATION OF SECTION 24242 of the Health and Safety Code of the State of California

source Roof Vent

POINT OF OBSERVATION APPROX. 100' East of Plume

WEATHER Clear

WIND Southwesterly PHYSICAL EVIDENCE (LIST)

O

RIVERTS DESCRIPTION	SEX	HEIGHT	WEIGHT	DATE OF BIRTH	COLOR OF EYES	COLOR OF HAIR
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VISIBLE EMISSIONS OBSERVED

INSPECTOR'S REPORT

START	STOP	MIN.	H. & C. % OP.	COLOR
p.m.	p.m.			
10:50	10:55	5	75%	Yellow

END 5 MIN.

addresses:

inspectors:
Buddy P. Fain and Robert L. Dextradeur
34 S. San Pedro Street
Los Angeles, California 90013

On July 3, 1975, Buddy P. Fain and Robert L. Dextradeur, Air Pollution Control District Inspectors, observed the discharge of air contaminants (part.matter) 75% opacity, aggregating 5 minutes from 10:50 p.m. to 10:55 p.m.) in excess of that allowed from a roof vent. The above equipment was being operated at 20201 South Normandie Avenue, Torrance, California, by the defendant Montrose Chemical Corporation of California, a corporation doing business in California.

The inspectors detected a #3 intensity chemical odor in the general vicinity of the defendant's chemical plant at approximately 10:46 p.m. on July 3, 1975. A #3 intensity odor is described as an odor of moderate intensity that would be readily detected and might be regarded with disfavor. (A possible nuisance in inhabited areas.)

The inspectors proceeded to defendant's chemical plant and observed yellow emissions discharging to the atmosphere from the most northerly section of the monitor ventilators,

(Cont. on Page 2)

RECOMMENDED

CH2M HILL/SCD

MONTROSE CHEMICAL CORPORATION OF CALIFORNIA,
a corp. doing bus. in Calif.
20201 So. Normandie Avenue
Torrance, Calif. 90501

(Cont. Page 2)

approximately one foot by five feet on the roof of the processing.

At about 10:56 p.m., the inspectors contacted Mr. Bernard Hollander, Production Supervisor, at the main gate of the defendant's chemical plant. The inspectors pointed to the emissions and Mr. Hollander stated that something must be wrong.

Mr. Hollander escorted the inspectors into the processing building. He stated to the inspectors that the flaker rollers had seized up with crystallized D.D.T., overheated, and had to be shut down. He explained the operation of the flaker to the inspectors.

The inspectors did not observe the yellow emissions discharging at or near the flaker or any other equipment inside the processing building, so a source, other than the vent, was not found.

On completion of their observations and investigation, Inspectors Fain and Dextradeur issued a notice on July 4, 1975, charging a violation of the California State Health and Safety Code Section 24242 to the defendant corporation through Mr. Bernard Hollander, Production Supervisor.

MONTROSE CHEMICAL CORPORATION OF CALIFORNIA,
a corp. doing bus. in Calif.
20201 So. Normandie Avenue
Torrance, California 90501

PRIORS:

On November 22, 1974, in the Los Angeles Municipal Court, Division 50, the defendant corporation pled nolo contendere to a violation of Health and Safety Code Section 24242, air contaminants in excess of that allowed from post-type agitators of an acid reactor. As a result, the defendant corporation paid \$125.00. Case No. 31497631.

Upon further inspection of the premises at 20201 Normandie Avenue, Torrance, California. Inspectors P. Dextradeur and R. Fain noticed equipment in operation without any control devices, a violation of the conditions of the permit, Section 24208.

The plant supervisor, Mr. Hollander gave Inspectors P. Dextradeur and R. Fain a basic run down on the operation of the equipment identified as the No. 5 flaker, as follows:

The chemical known as D.D.T. is heated to a molten state at which time the chemical travels through pipes to the flaker. The pipe that feeds the chemical to the flaker has a shut-off valve which is controlled by the operator. When the valve is open, the chemical feeds through three rollers, the rollers are ^(feed tank) injected with a brine solution which acts as a cooking cycle, which turns the chemical to a solid state and a knife or blade cleans the rollers dropping the now solid material onto a conveyor belt for the next operation.

Explanation of possible cause.

"Mr. Hollander stated:

"Mr. Martinez shut the material feed pipe off and the rollers also, and left the machine. Upon returning to the equipment, Mr. Martinez tried to start the equipment, the motors would not turn the rollers because some of the material had leaked from the feed pipe and became solid and seized the rollers. At that point, Mr. Martinez shut the brine off and injected steam into the rollers to heat the rollers and thus melted the material to a liquid state. But Mr. Martinez over shot the steam causing the material to form a viscous state. Upon further conversation with Mr. Hollander he first stated the

material identified to us as D.D.T. can turn to a gaseous state. Mr. Hollander later stated the material would not turn gaseous. On our initial contact with Mr. Hollander, I repeatedly referred to the plume as dust and Mr. Hollander agreed and did not take any corrective measure. On our first contact, Mr. Hollander agreed the plume was yellow, but on the second contact, he said the plume resembled a blue haze to him.

AIR POLLUTION CONTROL DISTRICT - LOS ANGELES COUNTY
434 SO. SAN PEDRO ST., LOS ANGELES, CALIFORNIA 90013

NOTICE OF VIOLATION

7-11-74 (DATE OF VIOLATION)

(NAME)

17777 S. F. INDUSTRIAL PARK OF CALIF.
(ADDRESS) (CITY)

17777 S. F. INDUSTRIAL PARK OF CALIF.
(LOCATION - ADDRESS OF VIOLATION)

(CITY)

707-30744-2
(SECTOR) (TELEPHONE NO.)

YOU ARE HEREBY NOTIFIED A MISDEMEANOR
HAS BEEN COMMITTED PURSUANT TO:

CALIFORNIA STATE HEALTH AND SAFETY CODE

SECTION 24247

SECTION

LOS ANGELES COUNTY A.P.C.D. RULES AND REGULATIONS

RULE

RULE

AIR CONTAMINANT	SMOKE	ODORS	DUST	FUMES	GASES	ACIDS
PARTICULATE MATTER						

OPACITY 75% AGGREGATING 5 MIN. FROM 6:00 am TO 10:00 pm

SOURCE OF EMISSION DISCHARGE OF AIR CONTAMINANTS
INTO THE ATMOSPHERE OR THAT ALLOWED FROM EMISSION
INTO THE ATMOSPHERE IN EXCESS OF FEET

CONTROL NO:

BY: R. E. George #111
(INSPECTOR)

R. E. George #112
(INSPECTOR)

TELEPHONE (213) 974-74

SERVED TO: John Doe, DATE 7-11-74

TITLE: Manager BY: R. E. George #111
(INSPECTOR)

No. G 9176

76N634A-6/74

RALPH E. GEORGE
DIRECTOR OF ENFORCEMENT